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Mr. Gary Miller
U.S. Environmental Protection Agency
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Dear Gary:

The severe drought in the Houston area has negatively affected the schedules for the Current Velocity and Upstream Sediment Load field studies. As discussed in the Field Study Plans (FSP) for these field studies, current velocity and sediment load data were to be collected during two high-flow events. Because of the ongoing drought, no high-flow events have occurred during the last two months and, thus, no high-flow data were collected. In fact, the flow rate over the Lake Houston dam and into the San Jacinto River is negligible because the lake level is about 3 feet below the crest of the dam. A significant amount of rain will need to fall in the lake watershed simply to fill up the reservoir and produce flow into the river, which is necessary before a high-flow event can occur in the Study Area. In addition, long-term weather forecasts for the Houston area predict that sufficient precipitation to fill Lake Houston, and create conditions for a high-flow event, is not likely to occur during the next 2 to 4 months. Thus, the inability to collect high-flow event data during these two field studies will make it necessary to adjust the schedule for the Chemical Fate and Transport Modeling Study as discussed below.

The present schedule shows that the draft report for the Chemical Fate and Transport Modeling Study is due to the USEPA in mid October 2011. We will not be able to meet that deadline due to the high-flow event data collection issues described above. We propose that the due date for submittal of the draft modeling report to the USEPA be moved to February 1, 2012. In addition, we propose that the following actions and activities be incorporated into the modeling study to increase the efficiency and effectiveness of interactions with USEPA's technical advisers during the modeling review process:

- With respect to the Current Velocity Field Study, the acoustic Doppler profiler (ADCP) that is presently deployed within the Study Area will continue to be deployed until two high-flow events occur.
- With respect to the Upstream Sediment Load Study, the automated suspended sediment sampler that is presently deployed will be shut down and removed from the Study Area. The automated sampler will be re-deployed after sufficient precipitation has occurred to increase the level of Lake Houston to a point where water is flowing over the dam again. After re-deployment, the automated sampler will remain in operation, as described in the FSP, until two high-flow events occur.
- To facilitate interactions with the USEPA technical advisors, a 2-day modeling workshop will be held during the weeks of August 22 or August 29, 2011. Anchor QEA (AQ) personnel will give presentations related to the hydrodynamic, sediment transport, and chemical fate and transport models, with the focus being on the following topics: 1) model structure; 2) development of input parameters, initial conditions, and boundary conditions; and 3) calibration strategy. It is anticipated that this workshop will be interactive and collaborative, with significant discussion between USEPA's technical advisors and AQ personnel.
- A second modeling workshop will be held during the weeks of October 17 or October 24, 2011. During this workshop, AQ personnel will present preliminary calibration results for the hydrodynamic, sediment transport, and chemical fate and transport models. Similar to the first workshop, it is anticipated that a significant discussion between USEPA's technical advisors and AQ personnel will occur. Based on those discussions, the model calibration will be refined, as needed, after the workshop.

Please contact us if you have any questions or concerns related to this proposed modification of the schedule and approach for the Chemical Fate and Transport Modeling Study.

Sincerely,



David C. Keith
Anchor QEA, LLC



C. Kirk Ziegler
Anchor QEA, LLC
